

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**SYREETA REDD,**

**Plaintiff,**

**V.**

**Civil Action No. 3:12-cv-00737**

**EMPOWERMENT CLINICAL &  
CONSULTING SERVICES, LLC,  
RUDI JACKSON, AUDREY CAMPBELL  
and BRALEY & THOMPSON, INC.,**

## Defendants

and

**BRALEY & THOMPSON, INC.,**

**Third-Party Plaintiff,**

**v.**

**RUDI JACKSON AND AUDREY CAMPBELL,  
INDIVIDUALLY AND AS TRUSTEES  
IN LIQUIDATION OF EMPOWERMENT  
CLINICAL & CONSULTING SERVICES, LLC**

### Third-Party Defendants.

## AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

2. Subject matter jurisdiction is asserted in this matter based on federal question jurisdiction pursuant to 28 U.S.C. § 1331.

3. This Court has personal jurisdiction over the Third-Party Defendants Rudi Jackson and Audrey Campbell as they are individuals and residents of the Commonwealth of Virginia.

4. Proper venue is asserted pursuant to 28 U.S.C. § 1391 in that substantial part of the cause action herein occurred in the Eastern District of Virginia.

5. Braley filed its Third-Party Complaint against Rudi Jackson and Audrey Campbell, individually and as Trustees in Liquidation of Empowerment Clinical & Consulting Services, LLC (collectively the “Third-Party Defendants”) on June 3, 2013.

7. The Third-Party Complaint was served on Rudi Jackson, individually and as Trustee in Liquidation of Empowerment Clinical & Consulting Services, LLC, on June 17, 2013, by posted service at 2101 Creek Top Way, Chesterfield, Virginia 23236.

8. The Third-Party Complaint was served on Audrey Campbell, individually and as Trustee in Liquidation of Empowerment Clinical & Consulting Services, LLC, on June 17, 2013, by posted service at 5100 Glenbeigh Drive, Richmond, Virginia 23234.

9. The Defendants were obligated to file responsive pleadings to the Third-Party Complaint no later than July 8, 2013.

10. None of the Third-Party Defendants have filed any response to the Third-Party Complaint nor have they appeared and defended this action.

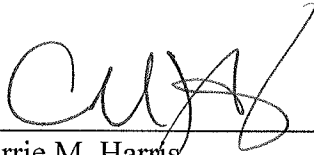
11. On November 11, 2013, Braley filed a Notice of Compliance (the “Notice”) (Doc. No. 75) along with copies of the Summonses and Third-Party Complaint that were previously served on the Third-Party Defendants, with the Clerk of the United States District Court for the

Eastern District of Virginia. The Notice stated that after expiration of ten (10) days after giving of the Notice, Braley intended to seek entry of default judgment against the Third-Party Defendants.

12. The Notice was served on the Third-Party Defendants.

13. More than ten (10) days have passed since Braley gave the Notice and the Third-Party Defendants have not responded.

Further, the affiant sayeth not.

  
\_\_\_\_\_  
Carrie M. Harris

The foregoing was executed in my presence by Carrie M. Harris, this 3<sup>rd</sup> day of December, 2013.

  
\_\_\_\_\_  
Notary Public

My commission expires: 7-31-16

Registration No. 7229385

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